

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JOHN DOE,)
Plaintiff,)
v.)
CLARK UNIVERSITY, DAVID P. ANGEL,)
PH.D., NADJA JOHNSON, PH.D., LYNN S.) C.A. NO.: 4:19-CV-40050-TSH
LEVEY, ADAM J. KEYES. HOLLY)
DOLAN, EVETTE WALTERS, JEFFREY)
MCMASTER, CHERILYN BONIN, AND)
JANE SMITH, AND DAVIS BAIRD,)
PROVOST.)
Defendants.)
)

JOINT MOTION TO EXTEND THE DISPOSITIVE MOTIONS DEADLINE

Now come plaintiff John Doe, defendant Jane Smith, and defendant Clark University (collectively, “the Parties”), and respectfully request this Honorable Court to extend the dispositive motions deadline by ninety (90) days. As reasons therefore, the parties state the following:

The Parties will be requesting to mediate this matter with the Honorable Magistrate Judge David H. Hennessy at their Status Conference scheduled for Wednesday, August 4, 2021. As such, the Parties request that the deadline for dispositive motions, currently Friday, August 27, 2021, be continued for ninety (90) days so that the mediation could be scheduled and held, the outcome of which will determine whether or not the drafting of dispositive motions will be necessary in this matter. This is the Parties’ third request for the extension of part of the

Tracking Order. The Parties further submit that the allowance of this motion will serve the interests of justice and judicial economy, insofar as no party will be prejudiced.

Wherefore, for the reasons stated above, the Parties respectfully request that this Honorable Court allow this motion allowing an extension for the filing of dispositive motions from August 27, 2021 to November 29, 2021.

Respectfully submitted,

The Plaintiff,
JOHN DOE
By his attorneys,

/s/ Robert A. Scott

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The Defendant,
JANE SMITH
By her attorneys,

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The Defendant,
CLARK UNIVERSITY
By its attorneys,

/s/ Jeffrey J. Nolan

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Dated: August 3, 2021

CERTIFICATE OF SERVICE

I, Margaret J. Pastuszak, hereby certify that on this day, document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent by first class mail to those indicated as non-registered participants.

/s/ Margaret J. Pastuszak
Margaret J. Pastuszak, Esq.

Dated: August 3, 2021